

# LATHROP & GAGE<sub>LLP</sub>

THOMAS A. RYAN  
DIRECT LINE: 816.460.5822  
EMAIL: TRYAN@LATHROPGAGE.COM  
WWW.LATHROPGAGE.COM

2345 GRAND BOULEVARD, SUITE 2200  
KANSAS CITY, MISSOURI 64108-2618  
PHONE: 816.292.2000  
FAX: 816.292.2001



March 2, 2012

Mr. Fouad Eadabneh  
Environmental Specialist  
Environmental Protection Agency - Region 5  
Superfund Division (SE-5J)  
77 West Jackson Boulevard  
Chicago, IL 60604

Re: General Notice Letter Sent to Industrial Disposal Company in Louisville,  
Kentucky for the Gary Development Landfill Site in Gary, Indiana  
CERCLIS ID # IND077005916

Dear Mr. Eadabneh:

We are counsel for Republic Services, Inc. (RSI), and your General Notice Letter to Industrial Disposal Company has been referred to us. In 2000, Industrial Disposal Company merged into Republic Services of Kentucky, LLC, a subsidiary of RSI, based in Louisville, Kentucky. We believe that Industrial Disposal Company had no relationship with the Gary Development Landfill. We found no records connecting Industrial Disposal Company to the Gary Development Site and it is highly unlikely that a Louisville-based disposal company would have hauled to a landfill in Gary, Indiana, more than 250 miles away, especially in light of the presence of many closer landfill options.

Additional information Ms. Wood provided to us gives us reason to believe that EPA may be notifying the wrong "Industrial Disposal" as a PRP. The Republic entity in Louisville, Kentucky is Industrial Disposal *Company*. EPA documents indicate the potential involvement of Industrial Disposal *Corporation* at the Gary Development Landfill. Our research shows that a distinct entity called Industrial Disposal Corporation was active in the Gary, Indiana area between 1960 and 1987. We understand Industrial Disposal Corporation was incorporated by Robert J. Doyle, Ted Peters and Mary Peters. We are currently investigating a potential nexus between RSI and Industrial Disposal Corporation. To the extent you have any information that might shed light on this issue, please let us know.

Mr. Fouad Eadabneh  
March 2, 2012  
Page 2

RSI is always cooperative with EPA and will be so at the Gary Development Site as well. Please contact me if you need any additional information. I look forward to working with you.

Sincerely,

LATHROP & GAGE LLP

By:

A handwritten signature in black ink, appearing to read "Thomas A. Ryan", written over a horizontal line.

Thomas A. Ryan

Cc: Ms. Nicole Wood

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Ms. Nicole Wood  
Associate Regional Counsel  
USEPA REGION 5  
77 West Jackson Boulevard  
Mail Code: C-14J  
Chicago, IL 60604-3507

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